

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Service Rules for the 698-746, 747-762)	WT Docket No. 06-150
and 777-792 MHz Bands)	
)	
Revision of the Commission's Rules to)	CC Docket No. 94-102
Ensure)	
Compatibility with Enhanced 911)	
Emergency)	
Calling Systems)	WT Docket No. 01-309
)	
Section 68.4(a) of the Commission's)	
Rules)	WT Docket No. 03-264
Governing Hearing Aid-Compatible)	
Telephones)	
)	
Biennial Regulatory Review –)	
Amendment of Parts 1, 22, 24, 27, and)	WT Docket No. 06-169
90 to Streamline and Harmonize)	
Various Rules Affecting Wireless Radio)	
Services)	
)	
Former Nextel)	PS Docket No. 06-229
Communications, Inc. Upper)	
700 MHz Guard Band Licenses)	
and Revisions to Part 27 of the)	
Commission's Rules)	WT Docket No. 96-86
)	
Implementing a Nationwide,)	
Broadband, Interoperable)	
Public Safety Network in the)	
700 MHz Band)	
)	
Development of Operational, Technical)	
and Spectrum Requirements for)	
Meeting Federal, State and Local Public)	
Safety Communications Requirements)	
Through the Year 2010)	

COMMENTS OF: WILLIAM F. GORDON

PRESIDENT, WYOMING STATE APCO CHAPTER

Hereby submits these reply comments in response to the Commission's *Further Notice of Proposed Rulemaking* in the above-captioned proceedings.

I would like to voice my concerns regarding the following:

1. I would have to be cautious about Public Safety relinquishing control solely to private business. When the responsibility is to the shareholders and the bottom line, the priorities are often not productive to the original intent of the working relationship between Private and Public. It is imperative that it be remembered that Public is the first word in Public Safety. Any solution must guarantee that Public Safety is the objective, not the bottom line of private industry. With Public Safety goes Public Trust. That must never be compromised.
2. It is mentioned that different agencies would be afforded priority on the system.
I cannot conceive of a method of prioritizing the vast and unpredictable myriad of events which would require a response from Public Safety. How would the priorities then be attached to each event, and what method would be used for guarding against abuse?
3. The individual states need the ability to see that each of their counties is given equal and effective coverage.
4. Any method using a population per square mile as a basis for amount of deployment would be detrimental to small counties, rural counties and counties with awkward urban configuration. In this method it would also be imperative to include data concerning tourism and interstate commerce.

Respectfully submitted,

William F. Gordon
President, Wyoming APCO Chapter
May 31, 2007